



Wisconsin Electric

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March 11, 2002

Ms Lynda Dorr, Commission Secretary
Public Service Commission of Wisconsin
610 N. Whitney Way
PO Box 7854
Madison, WI 53707-7854

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Electric

Dear Ms Dorr:

Wisconsin Electric is in the process of implementing the SchlumbergerSema fixed network system for Automatic Meter Reading (AMR). Our Phase 1 deployment plan runs from April 2002 through 2004 and includes the retrofit of approximately 146,000 self-contained single-phase and network meters, and 8000 compatible three-phase, all-electronic (solid-state) meters with under-the-glass type communication modules. Upon a decision to move forward with Phase 2, a similar number of meters will be retrofit during the 2005 through 2008 time frame. The modules will be installed at the SchlumbergerSema retrofit facility in West Union, SC. Wisconsin Electric is requesting the commission to approve the SchlumbergerSema retrofit center as a meter test facility for retrofit meters.

PSC 113.0902 Testing Equipment. (1) Each utility shall maintain sufficient laboratories, meter testing shops, secondary standards, instruments and facilities to determine the accuracy of all types of meters and measuring devices used by the utility. **A utility may, however, with the approval of the commission, have all or part of the required tests made or its portable testing equipment checked by the original equipment manufacturers, another utility, or testing agency having adequate and sufficient testing equipment to comply with these rules.**

Wisconsin Electric performed an on-site audit of the retrofit facility on February 19, 2002 to assess the quality of the facility and to insure that the facility meets all of the requirements for testing as stated in PSC113. Below is a summary of the findings of the audit team:

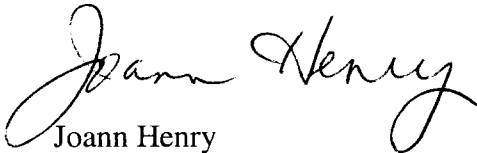
- Meters are retrofitted and tested in accordance with Wisconsin Electric specifications
- Test equipment and calibration standards are similar to those used at Wisconsin Electric, and well within all commission accuracy requirements
- Test equipment is marked and calibration records are kept with the test equipment
- All calibration equipment is traceable to NIST, and is checked annually.
- In general the test and calibration process was very similar to the process used by Wisconsin Electric

To insure compliance with all PSC meter records requirements, test records will be transferred to the Wisconsin Electric computerized records system through a system interface.

Based on the above findings we believe that the SchlumbergerSema facility has adequate and sufficient facilities to perform meter module retrofit and test work, in compliance with all applicable codes. We are asking for approval to use their facility to perform this work. We would appreciate an answer to this request by April 15, 2002, so that we can stay on track for meter retrofits beginning in May.

If you have questions, or if you require additional information , please feel free to contact Kelley Knoerr (414) 221-3025 or me at (414) 221-5074. Thank you for considering our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Joann Henry". The signature is fluid and cursive, with the first name "Joann" and last name "Henry" clearly distinguishable.

Joann Henry
Director - Field Operations

copies to: R. Norcross – PSCW
 J. Loock – PSCW
 R. Draba
 M. Moylan
 K. Knoerr
 K. Vlasek
 J. Shafer